



Nathan Noh  
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New York

March 10, 2025

***Re: Doyle v. Gentile et al., 1:21-cv-08528 (LTS) (OTW)***

Dear Judge Wang:

Pursuant to Rule I(a) of Your Honor's Individual Rules & Practices in Civil Cases and the Court's Order on March 4, 2025 (ECF No. 151), we submit on behalf of all parties a joint letter regarding three proposed dates on which Mr. Crawford will sit for up to 4.5 hours of testimony to complete his deposition.

1. **Mr. Crawford's Deposition**

The parties scheduled a meet and confer on March 5, 2025 to discuss scheduling the balance of Mr. Crawford's deposition. Mr. Gentile and counsel for Mr. Doyle were in attendance, and Mr. Crawford was absent. The parties subsequently continued to discuss Mr. Crawford's availability by email. (*See Exhibit A.*) Mr. Crawford provided the following availability: (1) Sunday, June 29, 2025 beginning at 6:00 pm ET; (2) Sunday, August 31, 2025 at 6:00 pm ET; and (3) Sunday, October 26, 2025 at 6:00 pm ET

Mr. Doyle requested availability from Mr. Crawford that was (i) within the next four weeks and (ii) during standard business hours. Mr. Crawford declined to provide different availability citing "personal and professional obligations" as limiting his ability to begin a deposition before 6:00 pm ET. (*See Exhibit A.*) The parties met and conferred on March 10, 2025 and were unable to reach an agreement on dates and start times.

A. **Mr. Doyle's Position**

Mr. Doyle respectfully requests that the Court issue an order compelling Mr. Crawford to provide three dates before April 30, 2025 to sit for a deposition beginning no later than 12:00 pm ET, which is to be finally confirmed by reasonable written notice of deposition from Mr. Doyle in accordance with Rule 30 of the Federal Rules of Civil Procedure.

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**CRAVATH, SWAINE & MOORE LLP**

B. Mr. Crawford's Position

- i. Deposition Start Time: My proposed availability reflects a start time of 6:00 PM EST due to personal and professional obligations. Any changes to this schedule should be mutually agreed upon rather than unilaterally imposed.
- ii. Request for Topics List: Under the applicable Federal Rules of Civil Procedure, it is both reasonable and standard practice to provide a general list of topics expected to be covered in a deposition. This request is not for specific questions but rather to ensure an efficient process and avoid unnecessary disputes during questioning. Plaintiff's refusal to provide this information departs from standard protocol and creates unnecessary opacity in the discovery process. Depositions should be conducted in a fair and transparent manner, and withholding a general outline of topics appears to be an unfair practice that does not align with the principles of procedural fairness.

2. Transcript of Mr. Doyle's Deposition

Mr. Doyle confirms, pursuant to the Court's March 4, 2025 Order (ECF No. 151), that he requested and obtained a copy of the transcript of his January 14, 2025 deposition from Veritext on March 4, 2025 and provided a copy to Defendants on March 5, 2025.

A. Defendants' Position

As Defendants, we respectfully seek to clarify the record regarding the provision of the deposition transcript of Mr. Doyle. On March 5th, Mr. Noh informed me that he would not be providing the transcript until March 10th in accordance with the Court's order. However, Ms. Dwyer kindly acknowledged that she had a copy of the transcript and promptly agreed to send it to us.

We appreciate Ms. Dwyer's professionalism and willingness to facilitate the process. We bring this clarification to the Court's attention solely to ensure an accurate understanding of the timeline and the actions taken by all parties regarding the provision of the transcript.

We thank the Court for its attention to this matter.

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As always, we thank the Court for its attention to this matter.

Respectfully,

/s/ Nathan K. Noh

Nathan K. Noh

The Honorable Ona T. Wang  
United States District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St., Room 20D  
New York, NY 10007

VIA CM/ECF

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VIA EMAIL AND FIRST CLASS MAIL

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copy of the foregoing March 10, 2025 joint letter to Judge Ona T. Wang to be served: (1) on Juan Antonio Crawford via electronic mail at iamjantonio@gmail.com on March 10, 2025; and (2) on Christopher Gentile via electronic mail at chrisgunome@gmail.com on March 10, 2025 and first class mail at his last known address, 825 Center Street, #28D, Jupiter, FL 33458 on March 11, 2025.

Dated: March 10, 2025

*/s/ Nathan K. Noh*

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Nathan K. Noh